

THE HONORABLE JAMAL N. WHITEHEAD

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

JAMES GLEASON, trustee, and JESSE SCOTT  
KENDOLL, trustee,

Plaintiffs,

v.

EVELYN SHAPIRO,

Defendant.

NO.: 2:22-cv-00305-JNW

STIPULATED MOTION TO STAY  
THE PROCEEDINGS

NOTE ON MOTION CALENDAR:  
May 2, 2023

The parties jointly stipulate to, and submit this proposed order for, a stay of all proceedings and for all purposes in the above-captioned case while the parties engage in mediation in June in an attempt to resolve this and other matters.

The basis for this stipulation is as follows:

1. Following the Court's ruling on Defendants' motions to dismiss, the above-captioned case is in discovery. Pursuant to the Court's existing Scheduling Order, Dkt. #23, expert testimony disclosures are due May 17, discovery motions are due June 16, and discovery is to be completed by July 17.

2. The parties, however, are engaged in mediation discussions to try to resolve this

1 dispute.<sup>1</sup> The parties are working with mediator Stephen Liacouras.

2 3. Mediation is being scheduled and is expected to take place in early June.

3 4. The parties believe it would be beneficial to stay these proceedings, including  
4 upcoming discovery obligations, to permit them the opportunity to try to resolve this dispute, and  
5 others, during the mediation in June. The parties request a stay to permit them to focus time and  
6 resources on settlement discussions.

7 5. The parties plan to file a status report with this Court within 14 days following the  
8 completion of mediation.

9 THEREFORE, the parties stipulate to, and request that the Court order, the following:  
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11 The above-captioned proceeding is stayed for all purposes during the pendency of the  
12 parties' mediation. The stay encompasses all discovery deadlines remaining as of the date of  
13 entry of this order.  
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25 <sup>1</sup> Other cases that are subject to settlement discussions in the mediation include: *United*  
26 *Brotherhood of Carpenters v. Shapiro*, 22-cv-245 (W.D. Wash.), 9th Cir. No. 23-35183; *United*  
27 *Brotherhood of Carpenters v. Shapiro*, 22-cv-1099 (W.D. Wash.), 9th Cir. No. 23-35184; and  
28 *United Brotherhood of Carpenters v. Sanchez*, 22-cv-5416 (W.D. Wash.), 9th Cir. No. 22-35182.  
This case has been identified as a related case to be included in mediation, and all parties to the  
above-captioned case will participate in the mediation.

1 Presented by:

2 DATED: May 2, 2023

3 By: /s/ Daniel M. Shanley

4 Daniel M. Shanley  
5 SHANLEY, A Professional Corporation

6 Charles Davant IV  
7 R. Kennon Poteat III  
8 Kaitlin J. Beach  
9 WILLIAMS & CONNOLLY LLP

10 Attorneys for Plaintiffs UNITED  
11 BROTHERHOOD OF CARPENTERS  
12 AND JOINERS OF AMERICA and  
13 PACIFIC NORTHWEST REGIONAL  
14 COUNCIL OF CARPENTERS

15 By: /s/ Joan K. Mell

16 Joan K. Mell  
17 III BRANCHES LAW, PLLC  
18 Attorney for Defendant EVELYN  
19 SHAPIRO

20 **ORDER**

21 The Court GRANTS the parties' Stipulated Motion to Stay the Proceedings. This matter  
22 is STAYED. The parties are directed to provide a status report within 14 days following the  
23 completion of the mediation.

24 Dated this 9th day of May, 2023.

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26 Jamal N. Whitehead  
27 United States District Judge